Gmail **LORCAN KILROY <lorcankilroy@gmail.com>**

# Fwd: HJC Harris complaint-To S.A. Yarbrough Reference Potential Confidential Human Sources - Email Domain Verification

**LORCAN KILROY** <lorcankilroy@gmail.com> Fri, Jun 19, 2026 at 3:21 PM
To: Sophia.Bollag@sfchronicle.com

---------- Forwarded message ---------
From: **LORCAN KILROY** <lorcankilroy@gmail.com>
Date: Mon, Jun 15, 2026, 5:33 PM
Subject: HJC Harris complaint-To S.A. Yarbrough Reference Potential Confidential Human Sources - Email Domain Verification
To: chad.yarbrough@ic.fbi.gov <chad.yarbrough@ic.fbi.gov>, Cc: <Robert.Gabriel@nsc.eop.gov>

Robert Gabriel Jr.
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METHOD OF SERVICE:Via Electronic Mail and FedEx

SUBJECT:Reference Potential Cooperating Individuals - Email Domain Verification

Director Yarbrough,

Regarding the potential cooperating individuals referenced previously, be advised that BCC recipients on this correspondence may question the validity of your ic.fbi.gov email domain.

For verification purposes, attached is a redacted file marked CONFIDENTIAL which documents ic.fbi.gov. The attachment evidences correspondence from a subordinate of yours replying to my inquiry after the Bureau's mail server converted his ic.fbi.gov address to fbi.gov.

Additionally, BCC'd on this transmission are legal counsel and other persons with tangential involvement in this matter. They have been included in the event they possess relevant information and wish to contact you directly, or forward this to other parties who may have information.

Also attached: Initial Declaration, marked "1st Decl. Kilroy to S.A. Yarbrough, and Exhibits A-J.pdf".

Respectfully,
Kilroy

---------- Forwarded message ---------
From: **LORCAN KILROY** <lorcankilroy@gmail.com>
Date: Sat, May 30, 2026 at 5:11 PM
Subject: HJC Harris complaint sub-investigations -SOBOROFF - to LAPD Chief Beck (Ret.)

# DECLARATION OF LORCAN T. KILROY

My name is Lorcan T. Kilroy. I am a retired civilian and former teacher with the Los Angeles Unified School District. I was employed by LAUSD from approximately 1998 to 2002 as a substitute teacher, from approximately 2002 to 2013 as a credentialed Art teacher, and was then involuntarily returned to itinerant substitute status from 2013 to 2016. I was subsequently permanently assigned for several weeks or months to a school formerly known as Millikan Middle School under then-Principal John Joseph Plevack of Henderson, Nevada. I was terminated from that position and my teaching credential was later revoked through prosecution by CAG  Harris for the CTC. This appears to have involved then-Deputy Attorney General Rochelle East, who may have drafted the CTC accusation before being appointed to the State bench and later reconfirmed by Governor Gavin Newsom.

This correspondence to FBI Assistant Deputy Director Chad Yarbrough is provided in support of the Bureau's investigation of the 2025 House Judiciary Committee

complaint against former CAG  Harris and related sub-investigations. I have no formal training in law or federal criminal investigations. My prior entry into the court system as a Pro Se litigant against the County of Los Angeles/LAUSD was due solely to unaffordable attorney retainer fees. I am available to attest to any of the facts laid out herein if called upon to do so.

I Lorcan T Kilroy declare,

1. In USDC Case No. cv 13 06373 DMG FFM, initial disclosures I received from LAUSD counsel included multiple witness statements that appeared to have been collected from adults and juveniles by 2012 Van Nuys High School Principal Judith Vanderbok of Woodland Hills, CA, and Assistant Principal Phyllis Gay Baer. The statements concerned allegations that a teacher, Arthur Thomson, committed battery, and possibly assault and criminal threats, against a student victim during class. The incident appears to have occurred across the classrooms of Thomson and teacher Gary Fraigun and the hallway between. A true and correct copy of all or nearly all of that batch of administrator-collected witness statements, provided to me by LAUSD counsel in USDC initial disclosures, is attached as **EXHIBIT A.**

2. LAPD Juvenile Division Detective Rose Ledesma Gaeta previously emailed me confirming that a SCAR had already been filed by another party after a student reported the Thomson incident to me. After Thomson told me in the school cafeteria that he had "lost it" but that school administration had "backed him up," and he continued teaching daily, I became concerned about the honesty of the school's and school police/LAPD's response.

3. I forwarded those apparently undisclosed adult and juvenile witness statements related to the Thomson incident, which became LAPD DR 12-09-11015, to Los Angeles Police Department Board of Police Commissioners President Steve Soboroff at his Montana Avenue real estate company office in Santa Monica. He personally called me to discuss the matter. During the call he stated his intention to show the statements "to everyone" and, regarding concerns of suppression, stated, "we don't do that." I am certain of his identity based on the context of our conversation and my recognition of his voice from public media. As an art teacher, receiving a call from the head of the Los Angeles Police Commission was highly unusual.

4. A photograph depicting Steve Soboroff, LAPD Chief Charlie Beck, and California Attorney General Kamala Harris seated together at a table in Los Angeles has since been removed from the internet, or I have been unable to locate it.

5. To date, to the best of my knowledge, the witness statements I provided and the availability of witnesses were never included in LAPD DR 12-09-11015, the related LAPD fact sheet, or the City Attorney's document. That document ultimately dismissed any Penal Code 242 battery charge citing "(B) Lack of sufficient evidence—no witnesses, no injury, no corroboration." For additional context, refer to my Supplemental 28 U.S.C. § 144 Affidavit filed in the SCOTUS docket at: https://www.supremecourt.gov/DocketPDF/18/18-9663/102922/20190614103217043_00000044.pdf

6. In 2026 I emailed LAPD Chief Beck regarding the apparently missing witness statements and received no reply, nor any acknowledgment of receipt. A true and correct copy of that email to Chief Beck is attached as **EXHIBIT B**.

7. In 2026 I emailed Steve Soboroff regarding the apparently missing witness statements. He replied, misspelling an LAPD POST investigator's name and omitting his own name after "Respectfully":

***"This is the first time I have heard of this situation. I have not spoken with Ms Harris since she was VP. Nor have I been contacted by Detective Sohlund I have no knowledge of the Thomson situation to which you refer Respectfully "***

I subsequently received no further response from him after requesting that he restate that information to S.A. Chad Yarbrough, at least preliminarily via email. A true and correct copy of Soboroff's response email and my request that he restate it directly to an agent, within other emails, is attached as **EXHIBIT C.**

8. Attached as **EXHIBIT D** is a true and correct copy of reports marked by LAUSD School PD and LAPD as DR 12-09-11015, with some redactions, provided to me in response to subpoena by LAPD/their City Attorney in cv 13-06373 DMG FFM.

9. Attached as **EXHIBIT E** is a true and correct copy of LAPD's so-called "fact sheet" regarding the Thomson incident, and associated command staff letters, provided to me in response to subpoena by LAPD/their City Attorney in cv 13-06373 DMG FFM.

10. Attached as **EXHIBIT F** is a true and correct copy of a City Attorney document dismissing potential charges in the Thomson incident, provided to me in response to subpoena by LAPD/their City Attorney in cv 13-06373 DMG FFM.

11. I did receive an authentication letter signed under penalty of perjury by an LAPD custodian at some point. Although it may be filed in the USDC records, I am unable to locate it at this time.

12. I cannot determine from the attached witness statements, **EXHIBIT A**, whether the account given by the student who initially reported the incident to me — Marcela Roman Tupul of Winnetka, CA, now in her 30s — was omitted alongside other statements from those disclosed in USDC initial disclosures by LAUSD OGC, David Holmquist, Marcos Hernandez, and Charlie Lee Hill, through their external counsel Thomas Hurrell, Amie Park, and Erica Bianco. Hill may have orchestrated actors on the ground at Van Nuys High after the incident — see attached POST complaint — and he has since been moved to the State bench by Gavin Newsom. At the time, Roman was an ESL student. Based on her hand

gestures, I could not discern whether she was describing choking or another form of physical assault; however, any reference to choking appears to be absent from the disclosed statements.

13. Detective Rose Ledesma Gaeta, LAPD, confirmed via email that a SCAR was filed regarding the Thomson incident. I forwarded that email to NBC. NBC's August 2013 report did not reference the SCAR or the email. I hand-delivered a printed copy of the email to NBC reporter John Cadiz Klemack during a meeting at a park near NBC's Burbank offices. I later observed that LAUSD General Counsel Holmquist appeared as a "friend" on Cadiz Klemack's Facebook profile. I am not alleging misconduct by Klemack.

14. NBC subsequently removed the video interview from its website. The video had aired on evening news and was posted online with multiple positive comments about a letter I wrote to parents under duress. That letter resulted in an 11-day suspension and was reported to the CTC. The letter was later cited as grounds for license revocation by CAG Harris and, presumably, DAG East. The basis for revocation appears to me subjective and without legal foundation. This raises questions of ulterior motive and supports my intent to request CALBAR review

current IJ DeCure, and CJP review current Judge East, regarding whether Harris directed OAH to reassign the matter to her former CAG DeCure to secure revocation due to concerns of exposure related to the Thomson affair.

15. I have no recollection of being formally served with the accusation from the California Commission on Teacher Credentialing (CTC). Attached as **EXHIBIT G** is an unauthenticated copy of the document, provided by CTC staff in 2026 in response to a PRA request. The copy is marked "*scanned document*" by CTC and does not include the Proof of Service; it is submitted for reference. To my recollection, I did not, or could not, timely file a declaration contesting each hearsay allegation. During the OAH revocation hearing, DAG Dalessio provided me several bankers boxes containing what I estimate to be hundreds of pages. I do not know whether the accusation was among those materials.

16. To date, I have not received a response from CTC Executive Director Sandy or other CTC representatives concerning my Public Records Act (PRA) request for, to my recollection: (a) proof of service of the CTC revocation accusation issued to me prior to the 2016 hearing; (b) voluntary authentication of the CTC accusation and of the custodian's apparent denial of records supporting allegations of criminal

activity or misconduct by officials involved in the revocation of my teaching credential; and (c) voluntary authentication of the denial of records supporting the validity of allegations related to the suppression of, or accessory after the fact in suppressing, witness statements and/or witness availability in connection with the Thomson Affair/LAPD DR 12-09-11015.

17. At my 2016 OAH revocation hearing, presided over by Administrative Law Judge DeCure, a former Deputy Attorney General under Kamala Harris, and attended by Harris's DAG Kristen Dalessio, I elected to remain largely silent. Subject to verification of the transcript, I repeatedly stated I was remaining silent and may have stated or implied that the proceeding was retaliation by Kamala Harris for my complaints regarding the Thomson Affair and related undisclosed witness statements. Prior to the hearing, I filed a complaint with the CTC detailing allegations involving then-LAUSD Superintendent John Deasy and the Thomson incident. I do not know whether CTC Executive Director Mary Sandy or Kamala Harris suppressed the investigation of that CTC complaint.

18. I recall receiving correspondence from CTC attorney Michael Barth, who may still be affiliated with the CTC as of 2026 and is listed with CALBAR under the email Kubotamike@gmail.com, acknowledging receipt of my complaint regarding John Deasy and the Thomson Affair. Barth, along with Sandy and current CTC General Counsel Vanessa Whitnell, may have information regarding the disposition of that Deasy complaint. They may also clarify whether the handling of my Deasy complaint was related to the Thomson Affair and efforts to suppress witness statements.

19. With respect to my recent email exchange with JC, former student, now an adult, of Van Nuys, CA — full unredacted identification and contact/email information previously provided to the Bureau — which was copied to Director Yarbrough, and which references statements attributed to JC by other adults in the attached unauthenticated 2026 CTC accusation: At this time I cannot confirm whether JC has furnished any information to the FBI, nor can I confirm, due to hearsay, whether he actually made those allegations. I categorically deny all allegations of mistreatment toward JC or toward the female student referenced in the unauthenticated 2026 CTC accusation. At no time did I yell or scream at these individuals, their parents, or any other involved parties. I did not threaten JC with

arrest. I did not ask whether he was in Special Education or had prior law enforcement contact. I did not tear up his work in front of the class. I have never placed harassing calls to JC's father, to his employer, or to any other parents. While an inadvertent callback or accidental dial may have occurred, there was no intentional harassment. Further, the claim that I screamed during a meeting with Van Nuys High School administrators is false. This set of unfounded and malicious hearsay allegations — a deliberate and false attempt to destroy my livelihood as an educator — constitutes one of the most egregious and unjust documents I have encountered.

20. The allegations attributed to JC are fabricated to such a degree that, absent legitimate evidence supported by a sworn statement or FBI documentation from JC, serious questions are raised. From my position, the parties responsible for drafting the CTC accusation — believed to be CAG attorneys — should be requested to clarify whether they obtained any sworn statements from me, or from me via LAUSD administration, prior to initiating the CTC prosecution. Had such sworn statements been provided and left unchallenged, they would have likely rebutted the hearsay claims attributed to JC and the female student. If that occurred, it is concerning that prosecution of these unsubstantiated hearsay claims

proceeded without requiring JC to address or refute them, despite the duty of candor. This raises concern that the proceedings may have been orchestrated to interfere with ongoing federal court cases — including matters before the Ninth Circuit and SCOTUS, specifically petitions No. 18-9663 and No. 20-354 — potentially shielding Harris and others from scrutiny regarding the suppression of Thomson witness statements.

21. I note that the accusation and subsequent 2016 revocation also omitted other earlier allegations made by LAUSD administrators in 2015. Those prior claims involved my day substituting for absent teacher Melanie Kim Weiss, Agoura Hills, CA, at Millikan Middle School — the school's name has since changed — after Millikan office administrative assistant Melody Delich placed me in Weiss' classroom for the day. An individual in Nevada appears to have since posted one or more Las Vegas obituaries for a Melody Danette Delich online. Attached is a true and correct copy of one such obituary, marked **EXHIBIT H.** However, online records show a Melody Newton Delich in Pickerington, Ohio, having relocated from Woodland Hills, CA, near Millikan. These may be two different individuals given the different middle names.

22. Those other fabricated statements by adults at Millikan Middle School, similarly attributed to minors, were not only completely fabricated but were then investigated not by Los Angeles police, as would be expected, but by LAUSD employee Julie Padilla. Julie Padilla is the sister of U.S. Senator Alex Padilla, a known associate of then-CAG Harris. This relationship is relevant in the context of my efforts to initiate investigation into whether then-CAG Harris, for political considerations, influenced the command staff of a major metropolitan police department to suppress witness statements from a police report to avoid media attention from an arrest that could affect her political trajectory and impact elections.

23. As Director Yarbrough has been advised, LAUSD is currently withholding key personnel file documents related to these matters, likely including the final page, page 11 of 11, of the Millikan report, possibly signed by Senator Alex Padilla's co-investigator sister Julie. This missing documentation may constitute a violation of both the Public Records Act and the California Labor Code. Page 11 of 11 appeared to be excluded from the report when previously filed by LAUSD with the U.S. District Court under the Declaration of Julie's co-investigator Ray Jordan, with Jordan's printed name appearing under an illegible signature that was

misspelled. The combination of the Senator Padilla connection, the apparent omission of page 11, and the signature error supports questioning of subjects to determine any links between Julie Padilla, Alex Padilla, Kamala Harris, and the Millikan falsifications. Additionally, LAUSD and Hurrell and Cantrall attorneys, including John V. McNulty, have not responded to my requests to correct the signature.

24. A POST (Peace Officer Standards and Training) complaint pertaining to the Millikan Middle School incident remains open. The basis is the participation of POST-certified co-investigator Ray Jordan in the administrative investigation, in conjunction with Julie Padilla. Jordan has since retired. This agency observed a public social media post indicating Jordan received formal recognition or commendation from the LAUSD Board of Education for assistance rendered to Board Members during his tenure.

25. Prior to, or subsequent to, obtaining written declarations from Millikan Middle School minors with parental consent and filing same in U.S. District Court, it appears CTC Executive Director Sandy and Kamala Harris elected not to include the aforementioned falsified allegations from Millikan in the formal CTC

Accusation filed against me. If the date accompanying Sandy's 2014 signature on the attached unauthenticated Accusation is accurate, no amendment was made to incorporate those allegations. Alternatively, there may have been an attempt to backdate the signature to conceal the omission, as the credential revocation did not occur until 2016, two years later.

26. J.C., referenced in paragraphs 19-20 above, is the same student who directed a slur ("faggot") at me during class in late 2011 after I addressed his use of headphones during instruction. Former Dean Maurice Mascari, believed to hold a Special Education credential, has not, to my recollection, confirmed or denied under oath whether disciplinary action was taken following my referral of J.C., or whether any such decision was at the direction of Principal Judith Vanderbok. I observed no consequence imposed and received no apology from J.C. J.C. returned to class after I referred him to the Dean's Office.

I questioned whether the school's apparent failure to address the slur, and what appeared to be a pattern of ignoring behavioral incidents in my classes prior to the slur, constituted retaliation for my previous U.S. Department of Education, Office for Civil Rights (OCR) complaint. That complaint alleged, to my recollection, a

systemic practice at Van Nuys High School of misclassifying defiant and ESL students as “SDC” (Special Day Class) to improperly secure additional federal special education funding.

Following that OCR filing, I observed multiple transfers of behaviorally challenged students into my classroom, including at least one student wearing an ankle monitor. The slur incident and other perceived changes in disciplinary response prompted me to write the attached letter, which was later reported by NBC.

Whether a directive was issued to Dean’s Office staff to handle referrals from my classes in a disparate manner can be confirmed or ruled out by Principal Vanderbok and Deans including Dean Cloutier, possibly Donald R. Cloutier of Granada Hills, CA, and the younger Dean involved with school athletics.

27. At no time between 2011 and the 2016 credential revocation did CAG or CTC staff contact me to obtain my statement, which I would have provided under oath during preparation of the revocation.

28. NBC erroneously reported that the parents of J.C., the student who yelled the slur, received my letter regarding student behavior. The letter was actually sent to parents of two other defiant students, and was later featured in NBC's coverage.

29. On the date of the revocation hearing, and after I to my recollection had exercised my one peremptory challenge of an ALJ, ALJ Ralph Dash being present in the hearing room prior to proceedings, an unexplained substitution occurred. Former Harris staff member ALJ DeCure was assigned to preside over my revocation hearing.

30.Marc Strassner, Assistant Principal at Van Nuys High School from 2011-2012 to present, can voluntarily provide a statement to verify the hearsay allegations attributed to J.C. that he testified to at the CTC hearing. To my recollection, those allegations were substantially similar or identical to those contained in the attached unauthenticated CTC Accusation.

Strassner is the spouse of the Honorable Lisa Strassner, Superior Court Judge appointed to the bench by Governor Gavin Newsom in 2022. He thus might speak candidly with FBI, CALBAR, or U.S. Department of Education investigators.

Strassner can clarify any knowledge or no knowledge of :

1. Who provided hearsay statements to the CTC attributing allegations to J.C. before the CTC Accusation was drafted;

2. Whether exculpatory evidence, classroom statements, or LAUSD investigative findings were withheld from CTC or by CTC; and

3. Whether he has knowledge of any party manipulating J.C. or of J.C. providing false statements.

This clarification is relevant because J.C.'s allegations attributed to J.C. were used by Sandy and Harris to supplement the CTC Accusation so it would not rest solely on the "2012 letter to parents."

31. Multiple written statements from students in my class at Van Nuys High School addressed hearsay allegations attributed to J.C. The allegations surfaced in an administrative meeting at Van Nuys High School, or in a memorandum or other document, prior to my reassignment from Van Nuys High. Those student statements asserted the allegations were false and/or not witnessed. I submitted the student statements to administrators. I may have also forwarded copies via email to CTC and CAG at a later date before revocation. One or more of the submissions may have included my own statements made under penalty of perjury regarding the J.C. allegations. Request identification of any party who suppressed said exculpatory student witness statements and/or failed to investigate or verify them prior to reporting J.C.'s purported allegations to CTC. Alternatively, determine whether CTC received the LAUSD investigative findings and student witness statements and declined to challenge J.C. Further inquiry needed as to whether such action was taken to impact licensure/income in relation to ongoing litigation, including potential interference under 18 U.S.C. with federal proceedings underlying SCOTUS Nos. 18-9663 and 20-354. Strassner, Vanderbok, LAUSD, and CTC counsel Vanessa Whitnell and Michael Barth, along with Executive Director Sandy, can provide statements to clarify these matters.

32. Subject to refutation by CTC Executive Director Sandy or the drafter of the accusation, or upon their cooperation with the FBI, the attached CTC document, Scanned Document_20260513_094617, signed by Sandy and likely authored by CTC Attorney Whitnell or DAG East at the direction of CAG Harris, or DAG's Waldow or Dalessio, appears to contain falsified submissions. The document relies on statements attributed to J.C. and an unidentified female student, and on excerpts from my 2012 letter to parents that are misleading and altered. Example: The accusation alleges I stated, "destroying educational privilege for others by disrupting classroom environments at school is a criminal act." The actual text reads, "Destroying educational privilege for others by disrupting classroom environments at school is a criminal act, that's how I view it, plain and simple," clearly identified as personal opinion and conditioned on robbery of others' graduation. At the time of the letter, LAUSD's graduation rate was 65% including summer school. A true and correct copy of a letter from then-Superintendent Deasy addressing those rates is attached as **EXHIBIT I,** obtained from the LAUSD website. A true and correct copy of the actual letter to parents, as downloaded from NBC and provided NBC did not alter it, is attached as EXHIBIT J.

33. Further discrepancies appear in paragraph 4 of the CTC accusation, which references a “removal management program for socially criminal students.” No such program is referenced in the letter that I can find. The full letter was not included with the accusation. The document also alleges I posed as an attorney or acted as an administrator/dean, despite my identification as “Mr. Kilroy,” known to students, parents, and staff as an Art teacher. These distortions raise questions regarding prosecutorial obligations of honesty and may warrant CALBAR review regarding potential concealment of crime/fraud, tolling of statutes of limitations for undiscovered crime/fraud, and/or Rule 8.3 obligations. LAUSD’s initial 11-day suspension for the letter was criticized on AM 870’s The Morning Answer and in comments on NBC’s site prior to their removal by NBC. Aside from literal inaccuracies regarding the letter, and in light of the 65% graduation rate and the perceived lack of disciplinary response to referrals submitted by me, including a reported slur, the accusation reflects subjective moral judgment without clear legal or ethical basis. State revocation of professional licensure should be conducted neutrally. The OAH procedures appear to have been utilized in a manner adverse to me by Harris, Sandy, and LAUSD.

34. CTC and the drafter of the accusation were likely aware that the reported slur attributed to J.C., documented in national media, preceded and may have prompted my 2012 letter to parents, given the apparent lack of consequences for that conduct. If ignorance of this context is claimed, despite the letter and slur receiving public discussion in media outlets and numerous communications I sent to CTC and CAG, a formal statement to that effect should be provided. Such a claim lacks credibility. The drafting of the accusation appears to separate J.C. 's reported lack of consequences from the events leading to the letter, creating the impression that the letter was written arbitrarily after years of service. These are not defense counsel. This misrepresentation implicates the duty of truth and warrants CALBAR investigation and a formal statement from the drafter regarding involvement or Rule 8.3 knowledge concerning the truth of part or all of the allegations in the HJC Harris complaint/Harris CALBAR complaint.

35. During the revocation hearing, administrators and Dean Mascari provided information based on hearsay regarding the letter and J.C. CTC did not present any direct witnesses. The allegation appears to be premised on false statements intended to characterize the letter as offensive, arbitrary, and immoral, which it was not. My classroom management was adequate. After I filed the Ed. OCR

complaint, I observed a concerning pattern. Individuals including Mascari and other deans—Donald Cloutier, possibly now of Granada Hills, CA, and a younger dean assigned to athletics—can address whether there were any actual changes in disciplinary responses. I became concerned. When the Casillas slur incident occurred, I became alarmed that the situation could seriously deteriorate and believed LAUSD had withdrawn support. At the time I authored the letter, 35% of LAUSD students were not graduating, as stated in Superintendent Deasy's 2013 announcement (EXHIBIT I).

36. Prior to the CTC hearing, I was provided a list of CTC witnesses scheduled to testify, which included students and/or parents. Based on that list, I did not issue subpoenas. None of those witnesses appeared at the hearing. To the best of my recollection, the only persons present were myself, DeCure, Dalessio, and Van Nuys administrators and the Dean referenced herein: Baer, Vanderbok, Strassner, and Dean Mascari. CAG counsel may determine whether this was an intentional and prejudicial tactic, and identify who initiated it.

37. It appears DeCure acted in a summary manner in ordering the revocation. As the transcript or recording, if available, will reflect, I repeatedly requested that DeCure administer the oath using the term "perjury" to each administrator. I am uncertain whether any witness was placed under penalty of perjury. DeCure can clarify whether Harris directed or pressured him to revoke the credential without legal basis. Additionally, DeCure, along with Ralph Dash and OAH Chief ALJ Zackery Morazzini, can address why Harris DAG DeCure was abruptly appointed to replace Ralph Dash as ALJ at the last minute. As George Cardona and Director Yarbrough are aware from cc'd correspondence, Morazzini has not explained the reassignment. Despite three PRA requests, one of which remains pending, he has not produced records documenting the decision, nor has he denied that private discussions with Harris may have influenced the change.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief and that this was executed on June 15, 2026, and can hand scribe below signature on request.

/s/ Lorcan T. Kilroy